

Honorable Marsha J. Pechman

**UNITED STATES DISTRICT COURT,  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

HUONG HOANG, an individual,

Plaintiff,

vs.

AMAZON.COM, INC., a Delaware  
corporation, and IMDB.COM, INC., a  
Delaware corporation,

Defendants.

NO. 11-cv-01709-MJP

**DECLARATION OF JOE  
KOLKOWITZ IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
SUMMARY JUDGMENT**

I, Joe Kolkowitz, do declare and attest as follows on the basis of my personal knowledge:

1. I am over the age of eighteen years of age, and competent to testify to the matters stated herein.

2. I am the owner and agent of Players Talent Agency. I have over 29 years of experience representing actors and ex-athletes in the entertainment industry. I work to create opportunities for my clients so that they can book roles in commercials, television shows, movies, infomercials, videos, and other entertainment mediums.

3. I am the agent for Huong Hoang, who I know as Junie Hoang.

4. Most working actors are not highly paid. Although a very few film stars can be paid millions for a single movie, most actors require steady employment—role after role, many in a year—in order to subsist and build their careers to a point where a decent

1 income is a possibility.

2 5. Unfortunately for actors who spend years building their careers, youth is  
3 king in the entertainment industry. There are far fewer characters over age 40 than there  
4 are younger roles. Even older characters are regularly played by younger actors.

5 6. This problem is especially severe for women. There are a very, very few  
6 “character” roles for female performers in their 40s and 50s. For the most part, roles for  
7 women are geared toward younger actresses.

8 7. Hollywood is absolutely stuffed with aspiring actors, and casting directors  
9 go through hundreds or thousands of resumes and headshots when considering who to  
10 call for an audition.

11 8. Because IMDb is so widely used by casting professionals, an over-40  
12 actress whose age is known is at a disadvantage to an over-40 actress who has managed  
13 to keep her age from IMDb. If an actress’s actual age is available, casting directors  
14 routinely reject actresses based on their age even if they appear young: no matter how she  
15 looks, an actress in her 40s simply won’t get as many auditions for younger roles—or any  
16 roles—as an actress in her 20s or 30s. The case for Ms. Hoang is no different; when a  
17 casting director knows her real age, she either isn’t called for an audition for a youthful  
18 role, or doesn’t get the part even if she does audition.

19 9. I reviewed my records and compiled a list of the four bookings I directly  
20 secured for Ms. Hoang. In 2007, I helped her get a role in “Tropic Thunder”. In 2008, I  
21 helped her get roles in “America’s Most Wanted” and “Wexley PC”. Finally, in 2009, I  
22 helped her get a role in a Neutrogena commercial. I have not secured any other roles for  
23 Ms. Hoang.

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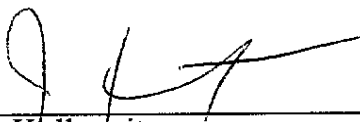
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1 I certify and declare under the penalty of perjury under the laws of the United  
2 States that to my knowledge the foregoing is true and correct.

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4 Executed this 8 day of December, 2012 at Los Angeles, California.

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8 Joe Kolkowitz  
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